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NAVTEQ CORPORATION

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

\*E-FILED - 8/17/06\*

TELE ATLAS N.V. and TELE ATLAS  
NORTH AMERICA,

Plaintiffs,

v.

NAVTEQ CORPORATION,

Defendant.

) Case No. 05 C 01673 RMW

) **STIPULATED REQUEST AND**  
) **[] ORDER TO EXTEND**

) **THE DISCOVERY CUT-OFF;**  
) **DECLARATION OF ANDREW M.**  
) **JOHNSTONE IN SUPPORT THEREOF**

) Complaint filed April 22, 2005

) The Honorable Ronald M. Whyte

Subject to the approval of this Court, the parties hereby jointly request and stipulate to a short extension of the discovery cut-off and modification of pretrial deadlines as shown below pursuant to Rule 6, Fed. R. Civ. P., and Local Rule 6-2.

This is a complex antitrust case in which discovery covers a nearly ten-year period. *See* Declaration of Andrew M. Johnstone ¶ 2, attached hereto as Exhibit A. Consequently, document production in this matter has been voluminous with both sides producing a combined total of roughly 400,000 pages of documents to date. *Id.* Moreover, both sides continue to produce documents on a rolling basis. *Id.* ¶ 3. Additionally, the parties have met and conferred over various discovery-related issues multiple times and thus far have been able to avoid the Court's involvement. *Id.* However, in order to complete outstanding document discovery, conduct deposition discovery, and otherwise defend and prosecute this case, the

parties agree that a short extension of the Court-ordered schedule is required. *Id.* ¶ 4. The parties note that this would be the **first** modification of the schedule originally set by the Court. *Id.* ¶ 5. Moreover, this proposed extension would delay the ultimate resolution of this case by only a few months compared to the existing schedule. *Id.*

The parties specifically request new deadlines as follows:

**The current schedule:**

**The Parties' proposed schedule:**

Fact discovery closes September 1, 2006

Fact discovery closes January 31, 2007

Expert discovery closes December 31, 2006

Expert discovery closes March 30, 2007

Dispositive motions due January 19, 2007

Dispositive motions due April 13, 2007

Pre-trial conference on April 19, 2007

Pre-trial conference on July 12, 2007

Trial to begin the week of May 14, 2007

Trial to begin the week of July 23, 2007

(jg)

(jg)

(jg)

Because there is good cause for the modest extension of discovery and modification of the case schedule, the parties respectfully request the Court's approval of the proposed schedule.

SO STIPULATED:

Dated: August 14, 2006

QUINN EMANUEL URQUHART OLIVER &  
HEDGES, LLP

By: /s/ David Eiseman

Attorneys for Plaintiffs

TELE ATLAS N.V. AND TELE ATLAS NORTH  
AMERICA

Dated: August 14, 2006

WINSTON & STRAWN LLP

By: /s/ Andrew P. Bridges

Attorneys for Defendant

NAVTEQ CORPORATION

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: 8/17/06

/S/ RONALD M. WHYTE

UNITED STATES DISTRICT COURT JUDGE